

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Actions No. 2:13-cv-193 (NGR)

**PLAINTIFF AND PLAINTIFF-INTERVENORS' OBJECTIONS  
TO DEFENDANTS' ELEVENTH SUPPLEMENTAL EXHIBIT LIST**

Plaintiffs and Plaintiff-Intervenors hereby submit objections to exhibits contained in Defendants' Eleventh Supplemental Exhibit List (ECF No. 607).

- DEF2758 (Trey Hood Second Supplemental Rebuttal Report): Plaintiffs object to the portions of this report that contain new analysis on subjects not previously addressed by Dr. Hood, in violation of the parties' agreement regarding revision of expert reports. Trial Tr. 7:4-9:5 (Sept. 10, 2014) (permitting "amended reports limited strictly to the recalculation of the data as a result of the recategorization of the surrender data and as a result of the [deposition on written questions]"). Plaintiffs also object to the admission of this document on the basis of hearsay, based on the agreement that expert reports would be admitted only if the expert appeared to testify concerning the report or based on some other agreement. Finally, plaintiffs object to this report as an untimely expert disclosure under Rule 26(a)(2) and this Court's final scheduling order (ECF No. 466).
- DEF2759 (Data File Received September 12, 2014): No objection.

- DEF2760 (No Match List Received September 12, 2014): No objection.
- DEF2761 (New York City Inspector General Report): Plaintiffs object pursuant to Rule 26(a)(3) based on Defendants' untimely disclosure of this document, notwithstanding Defendants' reliance on this document in their case in chief. Plaintiffs also object on the basis of hearsay to Defendants' reliance on this document for the truth of the matters asserted therein.
- DEF2762 (Deposition of Sammie Bates): No objection.
- DEF2763 (Deposition of Elizabeth Gholar): No objection.
- DEF2764 (Deposition of Ramona Bingham): No objection.
- DEF2765 (Deposition of Phyllis Washington): No objection.
- DEF2766 (Deposition of Naomi Eagleton): No objection.
- DEF2767 (Deposition of Ruby Barber): No objection.
- DEF2768 (Deposition of Vera Trotter): No objection.

Date: September 18, 2014

KENNETH MAGIDSON  
United States Attorney  
Southern District of Texas

Respectfully submitted,

MOLLY J. MORAN  
Acting Assistant Attorney General  
Civil Rights Division

/s/ Daniel J. Freeman  
T. CHRISTIAN HERREN, JR.  
RICHARD A. DELLHEIM  
MEREDITH BELL-PLATTS  
ELIZABETH S. WESTFALL  
BRUCE I. GEAR  
JENNIFER L. MARANZANO  
ANNA M. BALDWIN  
DANIEL J. FREEMAN  
Attorneys, Voting Section  
Civil Rights Division, Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on the following counsel of record:

John B. Scott  
John Reed Clay, Jr.  
Gregory David Whitley  
Jonathan F. Mitchell  
Sean Flammer  
Stephen Ronald Keister  
Arthur D'Andrea  
Jennifer Marie Roscetti  
Lindsey Elizabeth Wolf  
Office of the Texas Attorney General  
john.scott@texasattorneygeneral.gov  
reed.clay@texasattorneygeneral.gov  
david.whitley@texasattorneygeneral.gov  
jonathan.mitchell@texasattorneygeneral.gov  
sean.flammer@texasattorneygeneral.gov  
ronny.keister@texasattorneygeneral.gov  
arthur.dandrea@texasattorneygeneral.gov  
jennifer.roschetti@texasattorneygeneral.gov  
lindsey.wolf@texasattorneygeneral.gov

Ben Addison Donnell  
Donnell Abernethy & Kieschnick  
bdonnell@dakpc.com

*Counsel for Defendants*

Chad W. Dunn  
Kembel Scott Brazil  
Brazil & Dunn  
chad@bradzilanddunn.com  
scott@bazilanddunn.com

J. Gerald Hebert  
Emma Simson  
Campaign Legal Center  
ghebert@campaignlegalcenter.org  
esimson@campaignlegalcenter.org

Neil G. Baron  
Law Offices of Neil G. Baron  
neil@ngbaronlaw.com

Armand Derfner  
Derfner, Altman, & Wilborn  
aderfner@dawlaw.com

Luiz Roberto Vera, Jr.  
lrvlaw@sbcglobal.net

*Counsel for Veasey Plaintiffs*

Christina Swarns  
Ryan P. Haygood  
Natasha M. Korgaonkar  
Leah C. Aden  
Deuel Ross  
NAACP Legal Defense and Educational  
Fund, Inc.  
cswarns@naacpldf.org  
rhaygood@naacpldf.org  
nkorgaonkar@naacpldf.org  
laden@naacpldf.org  
dross@naacpldf.org

Danielle Conley  
Jonathan Paikin  
Kelly P. Dunbar  
Sonya L. Lebsack  
Gerald J. Sinzdak  
Lynn Eisenberg  
Richard F. Shordt  
WilmerHale LLP  
danielle.conley@wilmerhale.com  
jonathan.paikin@wilmerhale.com  
kelly.dunbar@wilmerhale.com  
sonya.lebsack@wilmerhale.com  
Gerard.sinzdak@wilmerhale.com  
Lynn.eisenberg@wilmerhale.com  
richard.shordt@wilmerhale.com

*Counsel for Texas League of Young Voters  
Plaintiff-Intervenors*

Ezra D. Rosenberg  
Amy L. Rudd  
Lindsey Cohan  
Dechert LLP  
ezra.rosenberg@dechert.com  
amy.rudd@dechert.com  
lindsey.cohan@dechert.com

Wendy Weiser  
Jennifer Clark  
Myrna Pérez  
Vishal Agraharkar  
Brennan Center for Justice at NYU School of  
Law  
wendy.weiser@nyu.edu  
jenniferl.clark@nyu.edu  
myrna.perez@nyu.edu  
vishal.argraharkar@nyu.edu

Mark A. Posner  
Sonia Kaur Gill  
Erandi Zamora  
Lawyers' Committee for Civil Rights  
mposner@lawyerscommittee.org  
sgill@lawyerscommittee.org  
ezamora@lawyerscommittee.org

*Counsel for Texas State Conference of  
NAACP Branches Plaintiffs*

Jose Garza  
Marinda van Dalen  
Robert W. Doggett  
Peter McGraw  
Kathryn Newell  
Priscilla Noriega  
Texas Rio Grande Legal Aid, Inc.  
jgarza@trla.org  
mvandalen@trla.org  
rdoggett@trla.org  
pmcgraw@trla.org  
knewell@trla.org  
pnoriega@trla.org

*Counsel for Ortiz Plaintiffs*

Rolando L. Rios  
Law Offices of Rolando L. Rios  
rrios@rolandorioslaw.com

Preston Edward Henrichson  
Law Offices of Preston Henrichson  
preston@henrichsonlaw.com

*Counsel for Texas Association of Hispanic  
County Judges and County Commissioners  
Plaintiff-Intervenors*

/s/ Daniel J. Freeman  
Daniel J. Freeman  
Voting Section  
Civil Rights Division  
U.S. Department of Justice  
daniel.freeman@usdoj.gov